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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. 22-CR-00003-02 JSW
)	
Plaintiff,)	JOINT STATUS REPORT AND STIPULATION TO
)	CONTINUE HEARING AND EXCLUDE TIME
v.)	FROM APRIL 19, 2022, TO MAY 17, 2022 AND
)	[PROPOSED] ORDER
SHEILA QUINTANA,)	
)	
Defendant.)	
)	

The above-captioned matter is currently scheduled for a status conference before the Court via teleconference line on April 19, 2022. The parties now request that the status conference be continued to May 17, 2022, at 12:00 p.m.

The defendant appeared before the magistrate court in this district for the first time on February 2, 2022, and counsel was appointed on February 4, 2022. The government and defense counsel have agreed on the terms of a stipulated protective order, and the government produced an initial batch of discovery in February. The government is preparing to imminently produce a larger, second batch of discovery, and is reviewing whether there are additional materials requiring production. Discovery in this matter is voluminous, and defense counsel will need time to review the produced materials and to

1 confer with their client. The parties have had initial discussions and will continue to confer regarding
2 the case. The parties therefore request that the status hearing be continued to May 17, 2022, to allow
3 defense counsel sufficient time to review the forthcoming discovery materials and to confer with the
4 defendant.

5 The defendant agrees that the May 17, 2022, status hearing and further status conferences may
6 be held via teleconference line, and the defendant agrees to waive her personal appearance at this
7 hearing.

8 It is further stipulated by and between counsel for the United States and counsel for the
9 defendant that time be excluded under the Speedy Trial Act from April 19, 2022, through May 17, 2022.
10 The parties stipulate and agree that excluding time until May 17, 2022, will allow for the effective
11 preparation and continuity of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate
12 and agree that the ends of justice served by excluding the time from April 19, 2022, through May 17,
13 2022, from computation under the Speedy Trial Act outweigh the best interests of the public and the
14 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

15 The undersigned Assistant United States Attorneys certify that they have obtained approval from
16 counsel for the defendant to file this joint status report and proposed order.

17
18 IT IS SO STIPULATED.

19 DATED: April 12, 2022

/s/
JONATHAN U. LEE
SAMANTHA BENNETT
Assistant United States Attorney

20
21
22 DATED: April 12, 2022

/s/
AUGUST GUGELMANN
CARLY BITTMAN
Counsel for Defendant Sheila Quintana

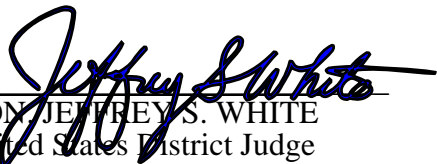
~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court, and for good cause shown, the Court hereby CONTINUES the status hearing currently scheduled for April 19, 2022, to May 17, 2022 at 12:00 p.m. The status hearing will be held by teleconference line, and the parties are ordered to submit a joint status report no later than May 10, 2022.

The Court further finds that failing to exclude the time from April 19, 2022, through May 17, 2022, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from April 19, 2022, to May 17, 2022, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from April 19, 2022, through May 17, 2022, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: April 12, 2022


HON. JEFFREY S. WHITE
United States District Judge